BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

POSTAL BATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T36-1-12)

The United States Postal Service hereby provides the responses of witness Plunkett to the following interrogatories of Douglas F. Carlson: DFC/USPS-T36-1-12, filed on March 23, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2999; Fax –5402 April 6, 2000

DFC/USPS-T36-1. Please refer to your testimony at page 1, lines 17–20. Please confirm that customers derive some value from a tracking system that informs customers that an Express Mail item has arrived at the destination post office. If you do not confirm, please explain.

DFC/USPS-T36-1 Response. Although I'm not aware of a study that would confirm this supposition, it seems intuitively correct.

DFC/USPS-T36-2. Please confirm that customers may receive notice that an Express Mail item has arrived at the destination post office by entering the tracking number at the Postal Service's Web site. If you do not confirm, please explain.

DFC/USPS-T36-2 Response. Confirmed.

DFC/USPS-T36-3. Please explain the process by which tracking information is uploaded from field offices to a database for customer access.

DFC/USPS-T36-3 Response. Offices which are engaged in collecting tracking information are connected to the system that stores and processes tracking information through a wide area network. The precise method of data transmission of data may vary somewhat depending on the particular office, though this is generally conducted over dedicated telecommunications equipment.

DFC/USPS-T36-4. Please provide any standards that the Postal Service has established for the number of minutes, hours, or days that may pass after a scan of an Express Mail article before customers can access the information via the tracking system.

DFC/USPS-T-36-4 Response. See response to DBP/USPS-78

DFC/USPS-T36-5. Please discuss the extent to which any standards described in DFC/USPS-T36-4 are being met.

DFC/USPS-T-36-5 Response. I am not aware of that any study of this issue has been undertaken.

DFC/USPS-T36-6. Please confirm that a customer sending an Express Mail article may communicate the tracking number to the recipient. If you do not confirm, please explain.

DFC/USPS-T36-6 Response. Confirmed.

DFC/USPS-T36-7. Please confirm that the recipient may derive some value from learning, via the tracking system, that an Express Mail article was accepted at the acceptance office. If you do not confirm, please explain.

DFC/USPS-T-36-7 Response. Not confirmed. The fact that a sender is communicating information about an article that as been sent presupposes that acceptance has taken place. It seems improbable that additional value inheres in the ability to confirm such acceptance via the tracking system.

DFC/USPS-T36-8. Please confirm that the speed with which information is reflected in the tracking system affects the value of Express Mail service. If you do not confirm, please explain.

DFC/USPS-T36-8 Response. Unable to confirm unconditionally. While it seems likely that customers would prefer information sooner rather than later, it is not clear what the threshold is below which customers are indifferent. For example, if all information is uploaded within six hours of the time that it is collected, there may be no additional value created were customers able to access the same information within 5.5 hours of its having been collected.

DFC/USPS-T36-9. Please confirm that, all else equal, customers would prefer that information be reflected in the tracking system sooner rather than later. If you do not confirm, please explain.

DFC/USPS-T36-9 Response. Confirmed. However, the probability that speed can be increased without affecting other variables is presumably very slight.

DFC/USPS-T36-10. If an acceptance scan is not reflected in the tracking system until more than six hours have passed, would you or the Postal Service consider this delay acceptable? Please explain.

DFC/USPS-T-36-10 Response. Whether or not a given span of time is acceptable depends on customer perceptions. See also my responses to DFC/USPS-t36-7 and DFC/USPS-T36-8.

DFC/USPS-T36-11. Please discuss the procedure for uploading acceptance scans (including frequency of uploads) to the tracking system at offices that offer retail window service 18 to 24 hours per day.

DFC/USPS-T36-11 Response. See my response to DBP/USPS-78.

DFC/USPS-T36-12. Please discuss the frequency with which information is uploaded to the tracking system for both hand-held scanner wands and retail terminals.

DFC/USPS-T36-12 Response. See response to DBP/USPS-78.

DECLARATION

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

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Dated: 4/6/00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 April 6, 2000